

Docket No: YHK-0119

PATENT

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF APPEALS AND INTERFERENCE**

In re Application of

Confirmation No: 9669

Hyun Mok YU and Joong Seo PARK

Group Art Unit: 2629

Serial No: 10/662,406

Examiner: Sherman, Stephen G.

Filed: September 16, 2003

Customer No: 34610

For: METHOD AND APPARATUS FOR DRIVING PLASMA DISPLAY PANEL

**SUPPLEMENTAL REPLY BRIEF**

U.S. Patent and Trademark Office  
Customer Window, Mail Stop Appeal Brief-Patents  
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Sir:

This Supplemental Reply Brief is filed in response to the Supplemental Examiner's Answer issued on June 2, 2009, in connection with the above-identified application.

The Supplemental Examiner's Answer appears to repeat arguments already made of record, with the exception of the statements made in Part (10), entitled Response to Arguments, on pages 14 and 15. Here, the Examiner addresses two arguments made in the Reply Brief.

**First Argument**

In Part (10) of the Supplemental Examiner's Answer, the Examiner addressed Appellants' position that the Tajima reference does not disclose the function of the adjuster recited in the claims. That is, Tajima does not disclose an adjuster for "adjusting at least one of the number of sustaining pulses or a subfield arrangement in accordance with a gray level distribution of said data." In

addressing this argument, the Examiner noted that the claims do not require receipt as an input a gray level distribution of data. This is true.

The claims only require the adjuster to adjust at least one of the number of sustaining pulses or a subfield arrangement *in accordance with a gray level distribution of said data*. The phrase “in accordance with” may be interpreted to cover the case where the gray level distribution of data is an input into the adjuster or alternatively the case where an indication of the distribution of data is otherwise provided to the adjuster. Either way, in order to supply the adjuster recited in the claims, means 75 in Tajima must adjust the subfield arrangement or number of sustaining pulses based on some form of notification of the gray level distribution of data. Means 75 does not perform such a function.

As disclosed at column 26, gray-scale level adjustment means 75 arranges a sequence of sub-frames for displaying data of one frame. This is accomplished using an intensity data arrangement switching means 101 and a frame counter 79. The sub-frames arranged by these means causes the gray-scale level of the image to be adjusted. (See column 26, lines 17-45).

In order to achieve the invention defined in the claims, the gray-scale level adjustment means of Tajima must perform its sub-frame sequence arrangement function in accordance with, or based on, a gray level distribution of data detected by a gray level detector. Without performing this function, the claims cannot be anticipated.

The gray level adjustment means of Tajima does not perform the function of the claimed adjuster. As shown in Figure 3, gray-scale level adjustment means 75 performs its sub-frame sequence arrangement function in accordance with: R7~0, G7~0, B7~0, VSYNC, HSYNC, BLANK, CLOCK, and FQ. The RGB inputs correspond to display data, VSYNC is a vertical synchronization

signal, HSYNC is a horizontal synchronization signal, BLANK is a blanking signal, CLOCK is a clock signal, and FQ is the same type of frame selection signal discussed at length in the Appeal Brief. None of these inputs corresponds to a gray level distribution of data detected by a gray level detector, as required by the claims. Therefore, Tajima does not include the adjuster as recited in the claims.

### **Second Argument**

In part (10) of the Supplemental Examiner's Answer, the Examiner also indicated that, while Tajima does not disclose something specifically called a gray level detector, means 75 of Tajima nevertheless qualifies as a gray level detector.

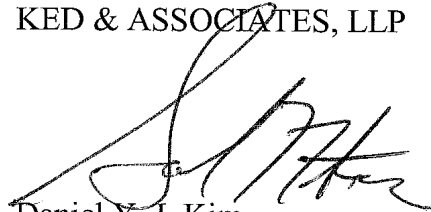
The claims recite "a gray level detector for the detecting a gray level distribution of a data." Regardless of what Tajima calls means 75, in order to qualify as the claimed gray level detector, means 75 must perform the function of detecting a gray level distribution, and then that gray level distribution must be used in performing the function of the adjuster recited in the claims.

However, the gray-scale level adjustment means 75 does not perform the function of detecting a gray level distribution of data. As shown in Figure 3, means 75 is formed from intensity data arrangement switching means 101 and frame counter 79. Neither of these features performs the function of detecting a gray level, and neither does controller 36. Moreover, column 26 of Tajima, which describes means 75 of Figure 3 in detail, makes not such disclosure. In view of the foregoing considerations, Appellants submit that Tajima fails to include the gray level detector recited in the claims.

Based on these arguments and the arguments in the Reply and Appeal Briefs, Appellants submit that the rejections of record are improper. Appellants respectfully request the Board to reverse these rejections so that the application may be forwarded to allowance.

Respectfully submitted,

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